

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

/

MOTION TO FILE SEALED DOCUMENTS

Plaintiffs move to file Plaintiffs' unredacted Opposition to Defendants Jenkins and Higgins' Motion to Quash Subpoenas as well as Exhibits 1 and 2 to the Declaration of Vanessa Baehr-Jones under seal.

Plaintiffs' counsel does not believe sealing of Exhibit 1 (Jenkins' interrogatory responses) is warranted, but Defendant designated the document as "Confidential" pursuant to the parties' protective order. Plaintiffs' counsel requested that counsel for Defendant remove the confidentiality designation from these responses or modify them to remove or redact personal identifying information. In response, Defendant's counsel provided a version that fully redacts nearly all responses. Plaintiffs intend to seek to de-designate this document as confidential but did not have time to do so before this filing. In the interim, Plaintiffs are required to file Exhibit 1 under seal pursuant to the protective order.

Sealed filing is appropriate with respect to Exhibit 2 as it contains financial records including copies of checks, and personal identifying information for Defendant Justin Jenkins

and third parties. Sealed filing is also appropriate with respect to Plaintiffs' unredacted Opposition because the redacted portions contain information from Exhibits 1 and 2.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 3, 2024 to counsel of record:

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